

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TQ Beta LLC,

Plaintiff,

v.

DISH Network Corporation;
DISH DBS Corporation;
DISH Network L.L.C.;
EchoStar Corporation;
EchoStar Technologies, L.L.C.;
Hughes Satellite Systems Corporation;
Sling Media, Inc.;

Defendants.

Civil Action No. 14-cv-848-LPS-CJB

JURY TRIAL DEMANDED

**DECLARATION OF ALI DHANANI IN SUPPORT OF
DEFENDANTS' OPENING CLAIM CONSTRUCTION BRIEF**

I, Ali Dhanani, declare:

1. I am an attorney with Baker Botts L.L.P. and counsel of record for DISH Network Corporation, DISH DBS Corporation, DISH Network L.L.C., EchoStar Corporation, EchoStar Technologies, L.L.C., Hughes Satellite Systems Corporation, and Sling Media, Inc. (collectively, "Defendants") the above-captioned action. I am over the age of 21 years and am competent to make this declaration. All of the statements set forth herein are true and correct and are based on my personal knowledge.

2. I submit this declaration in support of Defendants' Opening Claim Construction Brief.

3. This declaration is based on my personal knowledge and information I have reviewed. I have supervised the collection and copying of the documents submitted herewith.

4. Attached hereto as Exhibit 1 is a true and correct copy of Amendment and Remarks dated December 23, 2003, as filed in the prosecution history of the 7,203,456 Patent (the “456 Patent”). Defendants have highlighted portions of Exhibit 1 that are cited in Defendants’ Opening Claim Construction Brief.

5. Attached hereto as Exhibit 2 is a true and correct copy of Amendment After Final dated April 22, 2004, as filed in the prosecution history of the ’456 Patent. Defendants have highlighted portions of this Exhibit 2 that are cited in Defendants’ Opening Claim Construction Brief.

6. Attached hereto as Exhibit 3 is a true and correct copy of Amendment and Remarks dated July 6, 2004, as filed in the prosecution history of the ’456 Patent. Defendants have highlighted portions of this Exhibit 3 that are cited in Defendants’ Opening Claim Construction Brief.

7. Attached hereto as Exhibit 4 is a true and correct copy of Amendment dated May 18, 2005, as filed in the prosecution history of the ’456 Patent. Defendants have highlighted portions of this Exhibit 4 that are cited in Defendants’ Opening Claim Construction Brief..

8. Attached hereto as Exhibit 5 is a true and correct copy of Response After Final Rejection dated September 9, 2005, as filed in the prosecution history of the ’456 Patent. Defendants have highlighted portions of this Exhibit 5 that are cited in Defendants’ Opening Claim Construction Brief.

9. Attached hereto as Exhibit 6 is a true and correct copy of Final Office Action dated March 12, 2004, as filed in the prosecution history of the ’456 Patent. Defendants have highlighted portions of this Exhibit 6 that are cited in Defendants’ Opening Claim Construction Brief.

10. Attached hereto as Exhibit 7 is a true and correct copy of Final Office Action dated May 13, 2004, as filed in the prosecution history of the '456 Patent. Defendants have highlighted portions of this Exhibit 7 that are cited in Defendants' Opening Claim Construction Brief.

11. Attached hereto as Exhibit 8 is a true and correct copy of Office Action dated March 11, 2005, as filed in the prosecution history of the '456 Patent. Defendants have highlighted portions of this Exhibit 8 that are cited in Defendants' Opening Claim Construction Brief.

12. Attached hereto as Exhibit 9 is a true and correct copy of Final Office Action dated July 29, 2005, as filed in the prosecution history of the '456 Patent. Defendants have highlighted portions of this Exhibit 9 that are cited in Defendants' Opening Claim Construction Brief.

13. Attached hereto as Exhibit 10 is a true and correct copy of Advisory Action dated October 7, 2005, as filed in the prosecution history of the '456 Patent. Defendants have highlighted portions of this Exhibit 10 that are cited in Defendants' Opening Claim Construction Brief.

14. Attached hereto as Exhibit 11 is a true and correct copy of Notice of Allowance dated November 29, 2006, as filed in the prosecution history of the '456 Patent. Defendants have highlighted portions of this Exhibit 11 that are cited in Defendants' Opening Claim Construction Brief.

15. Attached hereto as Exhibit 12 is a true and correct copy of excerpts from Plaintiff's Initial Infringement Contentions As To All Defendants, dated April 13, 2015.

Defendants have highlighted portions of this Exhibit 12 that are cited in Defendants' Opening Claim Construction Brief.

16. Attached hereto as Exhibit 13 is a true and correct copy of Non-Final Office Action dated September 18, 2003, as filed in the prosecution history of the '456 Patent. Defendants have highlighted portions of this Exhibit 13 that are cited in Defendants' Opening Claim Construction Brief.

17. Attached hereto as Exhibit 14 is a true and correct copy of Final Office Action dated July 27, 2006, as filed in the prosecution history of the '456 Patent. Defendants have highlighted portions of this Exhibit 14 that are cited in Defendants' Opening Claim Construction Brief..

18. I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 24, 2015

Respectfully submitted,

/s/ Ali Dhanani

Ali Dhanani